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JUDGE KAPLAN'S CHAMBERS

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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Banco del Austro, S.A.,

Plaintiff,

v.

Case No. 1:16-cv-00628 (LAK)

Wells Fargo Bank, N.A.,

Defendant.

---------------------------------------x

JOINT STIPULATION EXTENDING THE TIME TO TO SERVE OPPOSITIONS TO AND REPLIES IN SUPPORT OF MOTIONS FOR SUMMARY JUDGMENT

The parties, Banco Del Austro, S.A. ("BDA"), and Wells Fargo Bank, N.A. ("Wells Fargo"), through undersigned counsel, entered into the following joint stipulation to extend the time for service of oppositions to and replies in support of motions for summary judgment pursuant to Federal Rule of Civil Procedure 56.

WHEREAS, pursuant to Local Civil Rule 6.1 of the United States District Court for the Southern District of New York, the parties are required to serve opposition papers, if any, to motions for summary judgment within fourteen days after service of the moving papers and reply papers, if any, in support of motions for summary judgment within seven days after service of opposition papers; and

WHEREAS, the deadline for the parties to move for summary judgment is October 3, 2017; and

WHEREAS, the parties, BDA and Wells Fargo, through undersigned counsel, have entered into this first joint stipulation to request an extension of time to serve: (i) opposition papers, if any, to motions for summary judgment to October 31, 2017; and (ii) reply papers in support of motions for summary judgment, if any, to November 14, 2017.

NOW, THEREFORE, IT IS HEREBY ORDERED THAT the deadline to serve oppositions to motions for summary judgment shall be 10/31/17 and the deadline to serve replies in support of motions for summary judgment shall be 11/14/17

A copy of the attorneys' signatures on this Stipulation shall serve the same purposes as an original signature.

Dated: September 29, 2017

Respectfully submitted,

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Attorneys for Wells Fargo Bank, N.A.

SO ORDERED:

Hon. Lewis A. Kaplan, U.S.D.J.

Dated: 10/5, 2017

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September 29, 2017

Via Email

Hon. Lewis A. Kaplan, U.S.D.J.
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: ***Banco Del Austro, S.A. v. Wells Fargo Bank, N.A.***
Case No. 1:16-cv-00628 (LAK)

Dear Judge Kaplan:

This firm represents Defendant Wells Fargo Bank, N.A. ("Wells Fargo") in the above-referenced action (the "Action"). Enclosed with this letter is a joint stipulation by Wells Fargo and Plaintiff Banco del Austro, S.A. ("BDA") requesting an extension of the time to serve oppositions to and replies in support of motions for summary judgment. This is the first request for an extension of time with respect to the service of opposition and reply papers in connection with the parties' motions for summary judgment, which are due October 3, 2017.

The parties have agreed to respectfully request that the Court grant an extension of the time allowed under Local Civil Rule 6.1 to serve opposition papers from 14 days following service of moving papers to 28 days following such service and reply papers from 7 days following service of opposition papers to 14 days following such service. Under this schedule, opposition papers, if any, must be served by October 31, 2017 and reply papers, if any, must be served by November 14, 2017.

The parties request the above briefing schedule in light of the extensive amount of discovery that they have undertaken and consequent complexity of issues to be briefed on the parties' respective motions for summary judgment. Combined, the parties produced tens of thousands of pages of documents, served seven expert reports, and took ten depositions. The requested additional time to serve opposition and reply papers will allow each party to work through the issues raised in discovery and detailed in the moving papers.

Respectfully submitted,

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Enclosure

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